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December 1, 2015

Honorable Frank Maas
United States Magistrate Judge for the
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312

**Re: *In re Terrorist Attacks on September 11, 2001, MDL 03-1570 (GBD) (FM)*
*Ashton et al. v. Al Qaeda Islamic Army et al., 02 CV 6977 (GBD/FM)***

Dear Judge Maas,

We are filing this letter-motion to request that the Court grant the attached amended proposed order of judgment for the *Ashton* wrongful death plaintiffs' pre death conscious pain and suffering claims in connection with the judgment by default against Iran entered on August 26, 2015. Also filed with the amended proposed judgment is Exhibit A listing the 851 decedents included in the *Ashton* motion. If there is anything else you require please let me know.

Respectfully submitted,

KREINDLER & KREINDLER LLP

By:  Andrew J. Maloney

AJM/gm
Enclosures

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001

03 MDL 1570 (GBD) (FM)
ECF Case

This document relates to:

Ashton et al. v. al Qaeda Islamic Army, et al., 02-CV-6977 (GBD)(FM)

[AMENDED PROPOSED] ORDER OF JUDGMENT

Upon consideration of the evidence and arguments submitted by wrongful death Plaintiffs in the *Ashton* cases referenced above and the Judgment by Default Against the Islamic Republic of Iran entered on 08/26/2015, together with the entire record in this case, it is hereby;

ORDERED that judgment is entered on behalf of all *Ashton* wrongful death Plaintiffs in *Ashton et al. v. Al Qaeda Islamic Army et al.*, 02-CV-6977 (GBD) (FM) for the estates of the decedents identified in the attached Exhibit A against the Islamic Republic of Iran; and it is

ORDERED that the 851 *Ashton* wrongful death estates of the decedents identified in the attached Exhibit A are awarded: (1) compensatory damages for conscious pain and suffering in the amount of \$2,000,000 each for a total of \$1,702,00,000; (2) punitive damages for conscious pain and suffering in the amount of \$6,880,000 each for a total of \$5,854,880,000; and (3) prejudgment interest on the compensatory damages awards for conscious pain and suffering of each decedent to be calculated at the rate of 9% per annum from September 11, 2001 until today.

Dated: New York, New York
_____, 2015

SO ORDERED:

GEORGE B. DANIELS
UNITED STATES DISTRICT JUDGE